

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

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Carrier Name, Address, Phone, Contact Person:

Cellular South Licenses, Inc.
125 South Congress Street, Suite 1100
Jackson, MS 39201-3304

Brian Caraway, Senior Buyer and Merchandising Manager
Ph. (601) 974-7524

Counsel: Lukas, Nace, Gutierrez & Sachs
Pamela L. Gist, Esq.
1650 Tysons Blvd., Suite 1500
McLean, Virginia 22102
Ph. (703) 584-8665
Email: pgist@fcclaw.com

- 1) Digital wireless phones tested. Cellular South presently purchases wireless telephone handsets that are manufactured by or for Nokia, Motorola, Audiovox (recently purchased by UT Starcom), LG, and Kyocera (collectively, "Vendors"). To our knowledge, these Vendors are not presently offering any CDMA/1X devices that are compliant with the ANSI C63.19 standard ("Compliant Phones"). Accordingly, no phone devices have been tested to date. Motorola asserts that all Motorola phones currently being purchased by Cellular South have telecoils in the speakers that couple with telecoil hearing aids, but further states that they have not submitted any products for the FCC grant code for hearing aid compatibility.

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- 2) Laboratory used. Cellular South does not presently have the means to internally conduct the adequate testing of handset devices for compliance with the ANSI C63.19 standard. Since our Vendors have made no compliant devices available, we have not yet contemplated the means whereby such testing would be conducted. It is likely that Cellular South would rely on its Vendors or their appointed distributors to conduct such testing, and that we would further rely on their representations regarding the compliance of each specific handset device.

- 3) Test results for each phone tested. As earlier indicated, no tests have been conducted to date.
- 4) Identification of compliant phone models and ratings according to ANSI C63.19. As earlier indicated herein, Cellular South has not yet identified any available CDMA/1X handset devices that are compliant with the ANSI C63.19 standard.
- 5) Report on the status of product labeling. Cellular South typically relies upon its Vendors to label all products prior to their shipment to our retail locations. To our knowledge, no Vendor has made specific arrangements for product labeling that makes reference to HAC.
- 6) Report on outreach efforts. As CDMA/1X HAC devices become available, Cellular South will employ reasonable efforts to publicly identify compliant phones for consumers and audiologists. Cellular South will also consider listing compliant phones on its Internet Site, and will explore effective ways to communicate relevant information to consumer groups. Retail salespeople will be trained regarding which digital wireless phones are compliant. Cellular South presently offers a 30-day trial period to all customers, and would presently intend to make this trial period available to customers seeking Compliant Phones.
- 7) Retail availability of Compliant Phones. As indicated previously herein, no Compliant Phones are presently available in Cellular South's retail outlets.
- 8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones. Motorola asserts that every Motorola phone that ships in the United States incorporates a telecoil in the speaker for the specific purpose of coupling with hearing aid telecoils. Audiovox is developing a CDM180 model that will be a Compliant Phone (an availability date has not been conveyed to Cellular South). Motorola, Nokia, and Audiovox have represented to Cellular South their intent to comply with FCC HAC requirements.
- 9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order. Audiovox, Motorola, and Nokia have each expressed to Cellular South their intent to comply with FCC HAC requirements. Both Nokia and Motorola are participating in the Alliance for Telecommunications Industry Solutions Incubator for HAC.
- 10) Number of compliant and non-compliant phone models offered at this time. Excluding discontinued, refurbished, and TDMA models, Cellular South's core assortment presently includes thirteen models of CDMA handsets. To our knowledge, none of these are Compliant Phones.

- 11) Differences in handset offerings among regions in service areas. Differences in handset offerings among regions in Cellular South's service area are common, and result from variable sell-through rates, controlled tests designed to demonstrate consumer response to selected new phones, and other factors. Cellular South's core assortment is presently consistent in all markets.
- 12) Ongoing efforts for interoperability testing with hearing aid devices. To date, Cellular South has not conducted such interoperability testing due to the non-availability of Compliant Phones.